

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO.: 3:23-cr-00035-CWR-LGI

THEODORE M. DIBIASE, JR.  
a/k/a “TED DIBIASE, JR.” a/k/a  
“TEDDY DIBIASE”

**MOTION FOR LEAVE TO ALLOW CLERK TO DOCKET  
MOTION AND EXHIBIT UNDER RESTRICTED ACCESS**

Comes now, the United States of America, by and through the U.S. Department of Justice, Criminal Division and the United States Attorney’s Office for the Southern District of Mississippi, and respectfully asks this Court for leave to allow the Clerk of Court to docket the United States’ Motion for Judicial Inquiry and the attached exhibit (“Motion”) under restricted access.

The Motion contains detailed information concerning counsels’ representation of the defendant in the instant matter as well as information about counsels’ representation of former clients. While the Court considers the Motion, the government is requesting the Court’s permission to file under restricted access to avoid any unnecessary prejudice to the parties named therein.

Wherefore, premises considered, the United States respectfully requests leave for the Clerk of the Court to docket the Motion under restricted access. The government has consulted with counsel for the defendant and has received no response.

Respectfully submitted this 9th day of October 2024.

Respectfully,

TODD W. GEE  
United States Attorney  
Southern District of Mississippi

By: /s/ David H. Fulcher  
DAVID H. FULCHER  
Assistant United States Attorney  
501 East Court Street, Suite 4.430  
(601) 965-4480  
DFulcher@usdoj.gov  
Bar No. 70179

BY: /s John Meynardie  
JOHN A. MEYNARDIE  
Assistant United States Attorney  
1575 20<sup>th</sup> Avenue, 2d Floor  
Gulfport, MS 39501  
(228) 563-1560  
Mississippi Bar No. 9912

MARGARET A. MOESER  
Chief, Money Laundering and Asset  
Recovery Section  
U.S. Department of Justice

BY: /s/ Adrienne E. Rosen  
ADRIENNE E. ROSEN  
Trial Attorney  
Criminal Division, MLARS  
1400 New York Avenue, NW  
Washington, DC 20005  
(202) 616-2690  
Adrienne.Rosen@usdoj.gov

GLENN S. LEON  
Chief, Fraud Section  
U.S. Department of Justice

BY: /s/ Della Sentilles  
DELLA SENTILLES  
Senior Litigation Counsel  
Criminal Division, Fraud Section  
Della.Sentilles@usdoj.gov  
(202) 445-8793

### **CERTIFICATE OF SERVICE**

I hereby certify that this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to all ECF participant(s) of this record.

DATED October 9, 2024

/s/ Adrienne E. Rosen  
Adrienne E. Rosen